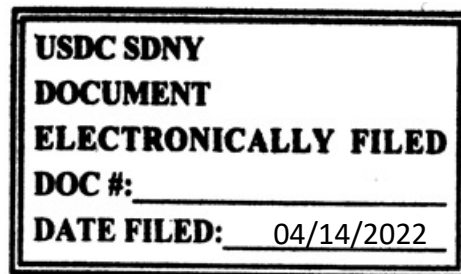


quinn emanuel trial lawyers | los angeles

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100



WRITER'S DIRECT DIAL NO.
(212) 849-7345

WRITER'S EMAIL ADDRESS
danbrockett@quinnemanuel.com

April 11, 2022

VIA ECF

The Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007
United States of America

Allianz Global Investors GmbH, et al., v. Bank of America Corporation, et al., 1:18-cv-10364

Dear Judge Aaron:

Pursuant to Rules I.B.1 and I.D of Judge Schofield's Individual Rules and Procedures for Civil Cases, we respectfully seek leave to file under seal certain supporting papers and exhibits to Plaintiffs' Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas. Pursuant to Rule I.D.3, this motion and supporting papers have been publicly filed with the redactions, and unredacted versions have been electronically filed under seal and linked to this application.

This request asks the Court to seal the Third Amended Complaint (already filed under seal), documents that reference numerous chat transcripts that Defendants produced and designated as confidential, copies of the chat transcripts, and personal information about the proposed deponent. Given Defendants designated these materials as "confidential," supporting papers include documents already filed under seal, and sensitive personal information of the deponent is contained within these papers, Plaintiffs respectfully request that the Court grant Plaintiffs permission to file the requested documents in redacted form on ECF and in unredacted form under seal.

quinn emanuel urquhart & sullivan, llp

ATLANTA | AUSTIN | BOSTON | BRUSSELS | CHICAGO | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH

Respectfully submitted,

/s/ Daniel L. Brockett

Daniel L. Brockett
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Fax: (212) 849-7100
danbrockett@quinnemanuel.com

Jeremy D. Andersen (pro hac vice)
Anthony Alden (pro hac vice)
Johanna Ong (pro hac vice)
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Fax: (213) 443-3100
anthonyalden@quinnemanuel.com
jeremyandersen@quinnemanuel.com
johannaong@quinnemanuel.com

Counsel for Plaintiffs

Request GRANTED. The proposed sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). SO ORDERED.

Dated: April 14, 2022

